

1 REGION: 10

AUTHOR: Tobin

KEY WORDS: (1) Western (2) Processing (3) Co. Inc.
 (4) Sail / GW

TYPE OF DOCUMENT

TECHNICAL

Doc No. 10-8208-04 D+E

- ☐ Technical Direction Document
- ☐ Acknowledgement of Completion
- ☐ Performance Evaluation
- ☒ Site Safety Plan
- ☐ Report
- ☐ Correspondence
- ☐ Subcontract Documents

ADMINISTRATIVE/CONTRACT

- ☐ (CEPA) Contract Letter from EPA
- ☐ (EFCL) Contract Letter to EPA
(including monthly reports)
- ☐ (EFLS) Contract Letter to Subcontractor
- ☐ (EFIC) Internal Contract Correspondence
- ☐ (EFCH) Meeting with EPA
- ☐ (EFEV) Equipment and Vans
- ☐ (EFST) Safety and Training
- ☐ (EFDC) Other Contract Correspondence (E & E)
- ☐ (FFDC) Other Contract Correspondence (FCH)

DISTRIBUTION

Instruction: Place an X before the appropriate (Technical or Administrative/Contract) master file. Then place an I (for Answer) before the name of the person from whom you want a response and/or an I (for Information) before the name of the person to whom you want only to provide information.

I National Project Management Office

- ☒ FII Technical Master File
- ☐ FII Administrative/Contract Master File
- ☐ Roger J. Gray, National Project Manager (NPM)
- ☐ Lewis A. Welzel, Asst. NPM for Tech. Performance
- ☐ Robert J. King, Asst. NPM for Training & Safety
- ☐ Jack Wilson, Contracts Coordinator
- ☐ John B. Schultz, Information Manager
- ☐ James Lukin, Training Coordinator

OTHER: _____

A-Washington

- ☐ Scott Fredericks, FII Project Officer
- ☐ William R. Topping, FII Contract Officer

OTHER: _____

EPA-Region No. 10

- ☒ DPO
- ☒ Ren Blair - Lab
- ☐ _____

FII Regions

<u>Regions</u>	<u>Personnel</u>
<input type="checkbox"/> I	<input type="checkbox"/> FII Leader
<input type="checkbox"/> II	<input type="checkbox"/> Regional Administrative Manager
<input type="checkbox"/> III	<input type="checkbox"/> Safety/Health Coordinator
<input type="checkbox"/> IV	<input checked="" type="checkbox"/> Equipment Coordinator
<input type="checkbox"/> V	<input type="checkbox"/> Training Coordinator
<input type="checkbox"/> VI	<input type="checkbox"/> Document Control Coordinator
<input type="checkbox"/> VII	
<input type="checkbox"/> VIII	
<input type="checkbox"/> IX	
<input checked="" type="checkbox"/> X	

OTHER: site file

(Rev. 4/30/82)

Date: 10-6-82

USEPA SF



1518495



ecology and environment, inc.

108 SOUTH WASHINGTON, SUITE 302, SEATTLE, WASHINGTON 98104, TEL. 206-624-9537

International Specialists in the Environmental Sciences

DATE: October 6, 1982

TO: Bruce Zaczynski, NPMO

FROM: Thomas Tobin, RSC
Region X FIT

Thomas A. Tobin
10-6-82

SUBJ: Site Safety Plan for Well Installation
and Soil/Groundwater Sampling
Western Processing Company, Inc.
Kent, WA

REF: TDD 10-8203-04 D & E

CC: Ron Blair

Enclosed is the site safety plan for drilling services and soil and groundwater sampling at Western Processing Company, Inc., Kent, WA (see attached figures). EPA personnel have agreed to follow our safety protocol.

Per our phone conversations and with your suggestions, field personnel and the drillers will wear Level C respiratory protective equipment (APRs) to protect against the possible and sudden release of dust, gases and/or vapors from the drilling and/or sampling of the groundwater monitoring wells. Personnel within 10 feet of the operating drill rig will wear MSA combination cartridges, GMA-H type; personnel greater than 10 feet from the drill rig will wear chemical cartridges, GMA type. The breathing zone above and around the drill hole will be monitored constantly with the Organic Vapor Analyzer (OVA) in the survey mode. Based on the list of synthetic organic compounds that were detected in soil samples collected at Western Processing (see Table 1), an action level of 25 ppm (25 ppm is the TWA for cyclohexanone, a cyclic aliphatic ketone similar in structure to detected 2,4-dimethylcyclobutenone) has been set for the OVA. OVA readings greater than 25 ppm in the breathing zone will require the use of SCBAs by all on-site drilling/field personnel.

EPA and FIT personnel and vehicles entering and exiting the site will be decontaminated at the Personnel and Vehicle Decontamination Station (see Fig. 3). Vehicles and equipment will be steam cleaned and the contaminated waste water will be collected into 55-gallon drums; likewise, personnel wash water will be stored in these drums. Drummed waste wash water will be analyzed to determine if it meets METRO standards. If the water does, it will be dumped into the nearest sewer for disposal.

Water generated from the development and purging of the ground-water monitoring wells will be left on-site with the owner's permission. If this is not possible, the water will be drummed for later off site disposal by the EPA.

Work coveralls will be removed after decontamination and stored in the off-site EPA dress-out van; coveralls will be washed once a week. The respirators will be wiped with water and sanitized once a week. Cartridge changes will be determined in the field. The inside of on-site vehicles will be lined with a polyethylene sheet to prevent contamination by on-site personnel. These polyethylene sheets and any additional disposables will be bagged for later off-site disposal by the FIT/EPA.

Western Processing is an active facility with employees and vehicles moving on-site with little regard for the field team. As this may pose an additional safety problem to us and our equipment, a Federal marshal will be with the field team for the first week. The owner of Western Processing will sign an agreement with the EPA stating that neither he nor his employees will interfere with our on-site work. Also, they will not touch the drilling equipment.

Enclosures as stated
TT:jg
FIT/16
wp-s-10/6

ECOLOGY AND ENVIRONMENT, INC.
FIELD INVESTIGATION TEAM
SITE SAFETY PLAN

A. GENERAL INFORMATION

SITE: Western Processing Company, Inc. TDD NO: 10-8203-04 D & E
7215 So. 196th Street WSTS NO: _____
LOCATION: Kent, WA
PLAN PREPARED BY: Thomas Tobin DATE: 10-6-82
APPROVED BY: Thomas Tobin DATE: 10-6-82
OBJECTIVE(S): _____

PROPOSED DATE OF INVESTIGATION: October 6-27, 1982
BACKGROUND REVIEW: Complete: X Preliminary: _____
DOCUMENTATION/SUMMARY: OVERALL HAZARD: Serious: _____ Moderate: X
Low: _____ Unknown: _____

B. SITE/WASTE CHARACTERISTICS

WASTE TYPES(S): Liquid X Solid X Sludge X Gas _____
CHARACTERISTIC(S): Corrosive X Ignitable _____ Radioactive _____
Volatile X Toxic X Reactive X Unknown X Other (Name) _____
FACILITY DESCRIPTION: Industrial waste recycling facility

Principal Disposal Method (type and location): unknown; on-site
burial of waste material suspected
Unusual Features (dike integrity, power lines, terrain, etc.) _____
site perimeter bermed
Status: (active, inactive, unknown) Active
History: (Worker or non-worker injury; complaints from public;
previous agency action): _____
RCRA violations [3008 RCRA order (6-4-81); 3013 RCRA order (8-17-82)]
NPDES violations; SPCC violations (1975)

C. HAZARD EVALUATION

Western Processing is an active recycler/reclaimer of hazardous materials. Spills from drums, waste lagoons, and pits and poor housekeeping procedures may be contributing to the water quality of Mill Creek and the shallow groundwater table. Analyses of soil samples collected from this site revealed a number of organic synthetic compounds (see Table 1) at levels < 10 ppm. These compounds may be volatilized into the air during the drilling process. Level C protective clothing will be worn by the field team, including the drillers, at all times on the site and will be upgraded to level B if necessary.

D. SITE SAFETY WORK PLAN

PERIMETER ESTABLISHMENT: Map/Sketch Attached X Site Secured? X
Perimeter Identified? X Zone(s) of Contamination Identified? No
Suggested contamination of shallow groundwater table.

PERSONAL PROTECTION

Level of Protection: A B C X D

Modifications: For environmental sampling, we will not be wearing butyl rubber booties or disposable booties. The decision to wear the butyl rubber apron will be made in the field.

Surveillance Equipment and Materials: OVA, HNU, Draeger pump and tubes for miscellaneous chemicals, radiation monitoring equipment, Monitox Compur 4100 for HCN.

DECONTAMINATION PROCEDURES: Modified level C decontamination procedures.

(see cover memo)

Special Equipment, Facilities, or Procedures: _____

Team will be briefed each day prior to site entry.

SITE ENTRY PROCEDURES: _____

<u>Team Member</u>	<u>Responsibility</u>
Thomas Tobin	Team Coordinator/Safety Advisor
Peter Evers	OVA Operator/On-site Safety
Jackie Betz	Sampler
Larry Gorelik	Sampler/Safety Person/Decon
Carol Mitrani	Geologist
Will Kemper	Possible OVA Operator
Various EPA Personnel	Observation
Fred Wolf	EPA Geologist and On-site Coordinator

WORK LIMITATIONS (Time of day, etc.): None

INVESTIGATION-DERIVED MATERIAL DISPOSAL: See cover memo

LOCAL RESOURCES

Ambulance Shepard Ambulance Service, 1307 S. 159th St., Renton, 322-0330
 Hospital Emergency Room Valley General Hospital, 16200 85th W., Renton, 244-9970
 Poison Control Center 634-5252
 Police 911/State Highway Patrol, 464-6610
 Fire Department Fire Bryn-Mawr - Skyway - Lakeridge District 20, 852-2121
 Airport Renton Airport 767-2545
 Explosives Unit 911
 EPA Contact John Osborn, ESD 442-0837

SITE RESOURCES

Water Supply FIT arranging for City of Kent to supply EPA trailer with water
 Telephone EPA arranging to have phone line installed at EPA trailer
 Radio Walkie-talkies from EPA and FIT
 Other _____

EMERGENCY CONTACTS

1. Dr. Raymond Harbison (University of Arkansas) . . . (501) 661-5766 or 661-5767
(501) 370-8263 (24 hour)
2. Regional Safety Officer Thomas Tobin
3. FIT Leader Hussein Aldis
4. FIT office Region X; 206-624-9537
5. Ecology and Environment, Inc. NPMO (703) 522-6065
(24 hour; call forwarding)
6. Regional Health Maintenance Program Contact
7. TAT Emergency Paging System (716) 882-2804
8. CHEMTREX 1-800-424-9300
9. Bruce Zaczynski (703) 522-6065
10. Dave Dahlstrom (716) 632-4491/741-2884

F. EMERGENCY ROUTES

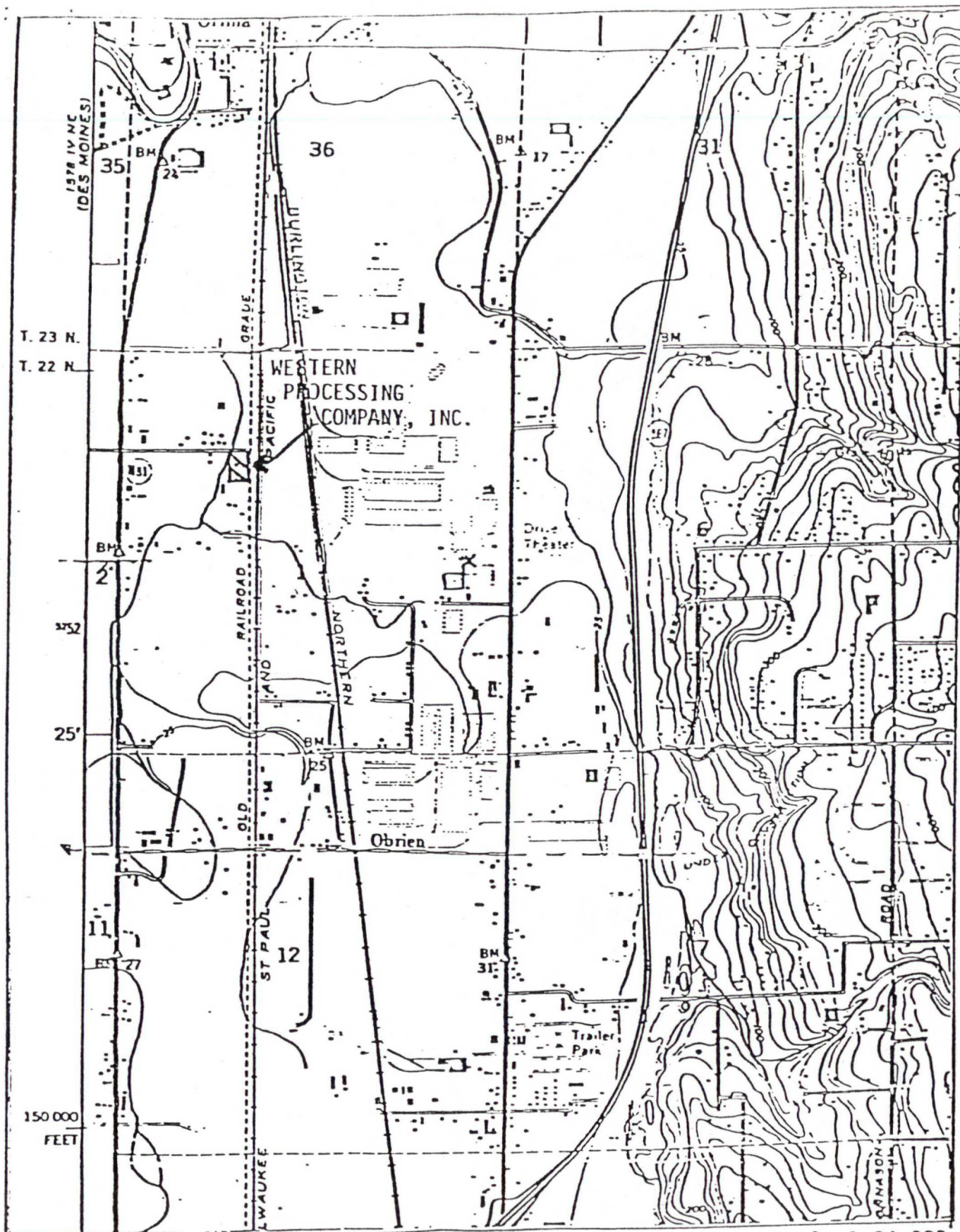
(Give road or other directions; attach map)

HOSPITAL: VALLEY GENERAL HOSPITAL: take 196th S. to West Valley Road (north)
to 43rd St. SW (east) to Talbot Road (north) -- should see the
hospital.

OTHER:

EQUIPMENT CHECKOUT

SCBA	<input checked="" type="checkbox"/>	CYLINDERS	<input checked="" type="checkbox"/>	EYE WASH UNIT	<input checked="" type="checkbox"/>
APR	<input checked="" type="checkbox"/>	CARTRIDGES	<input checked="" type="checkbox"/>	FIRST AID KIT	<input checked="" type="checkbox"/>
EXPLOSIMETER				DRINKING WATER SUPPLY	<input checked="" type="checkbox"/>
O ₂ INDICATOR				PERSONAL CLOTHING	<input checked="" type="checkbox"/>
DRAEGER PUMP	<input checked="" type="checkbox"/>	TUBES	<input checked="" type="checkbox"/>	DECONTAMINATION MATERIALS	<input checked="" type="checkbox"/>
RADIATION SURVEY METER				DOSIMETER BADGES	<input checked="" type="checkbox"/>
RADIATION CONTAMINATION METER	<input checked="" type="checkbox"/>			OVA	<input checked="" type="checkbox"/>
				HNU	<input checked="" type="checkbox"/>



USGS 1949

FIGURE 1
LOCATION MAP
WESTERN PROCESSING COMPANY, INC.
KENT, WASHINGTON

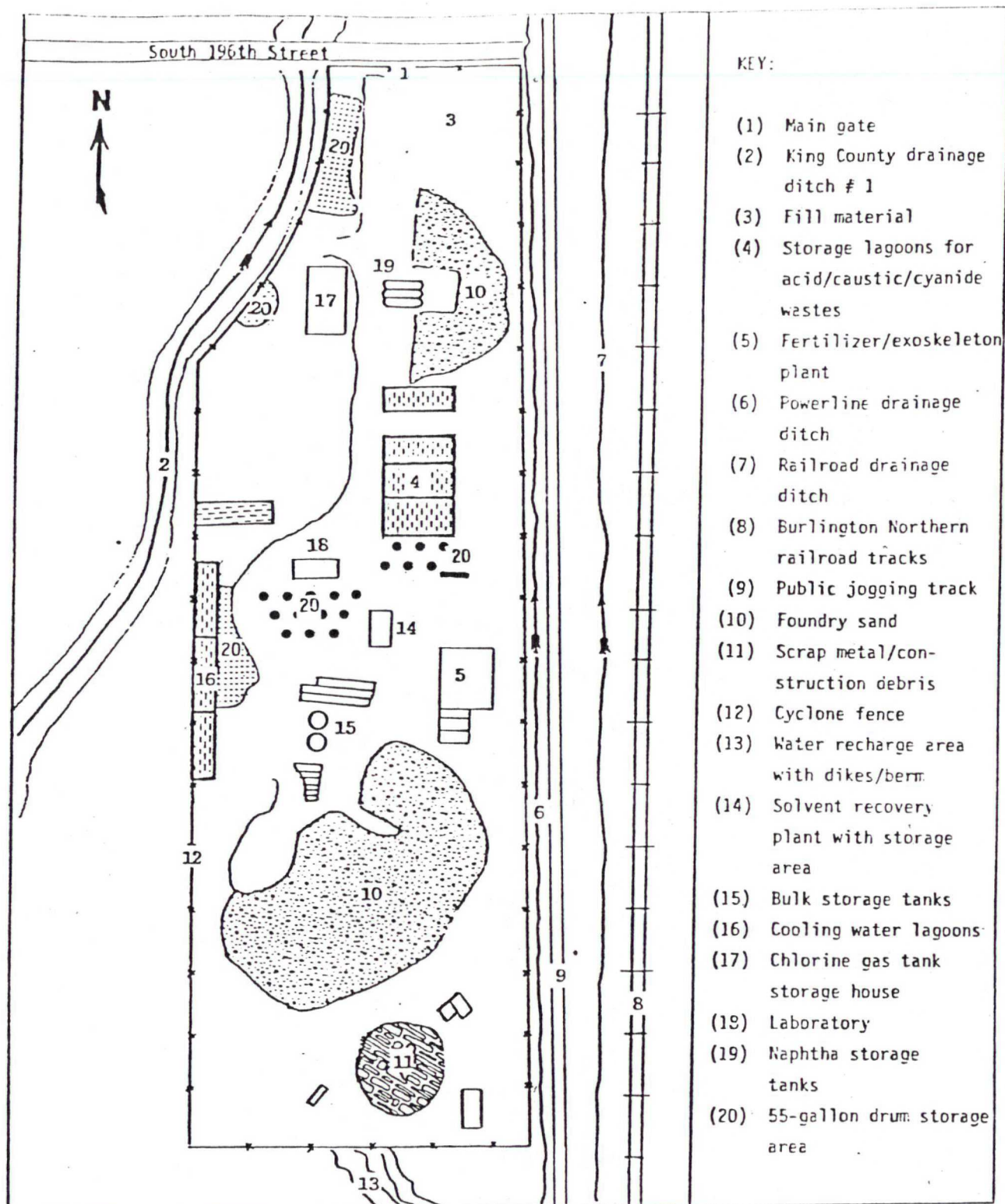


Figure 2: Site Plan. (1980)
Western Processing Co., Inc.
Kent, WA

WESTERN PROCESSING COMPANY, INC.

Mill Creek

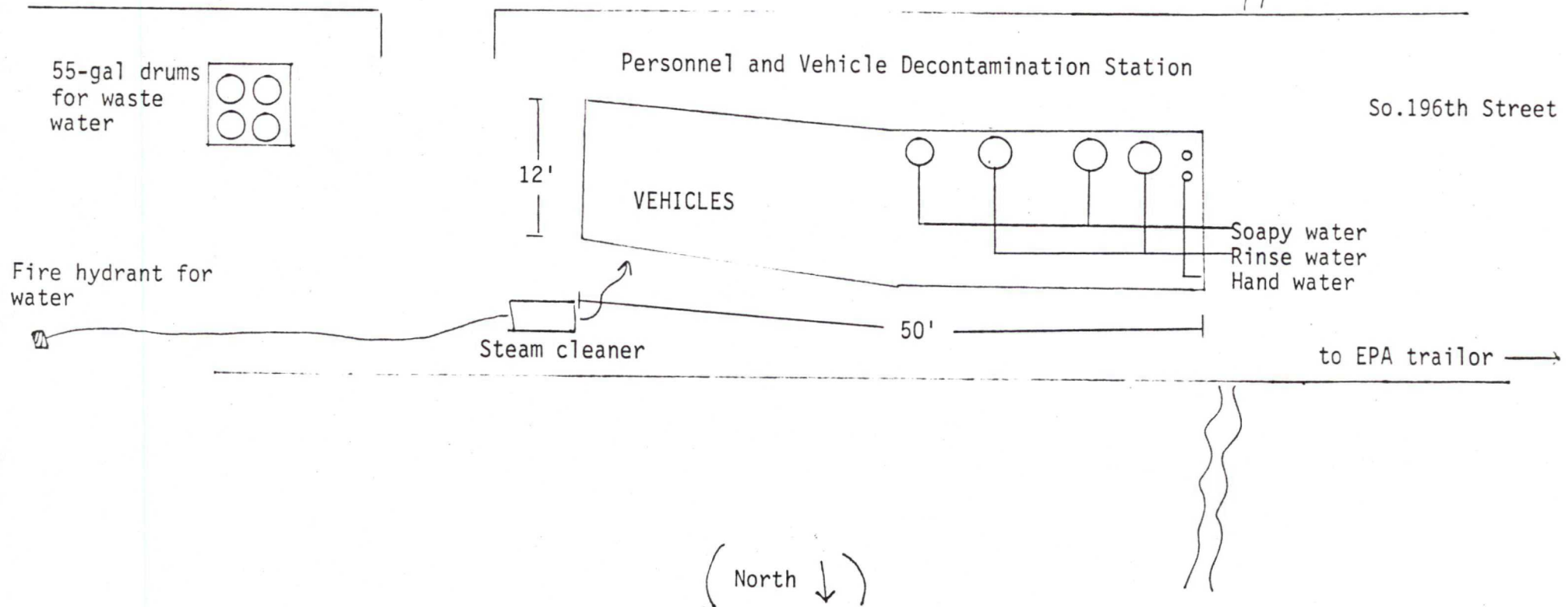


FIGURE 3
PERSONNEL AND VEHICLE DECONTAMINATION STATION
WESTERN PROCESSING COMPANY, INC.

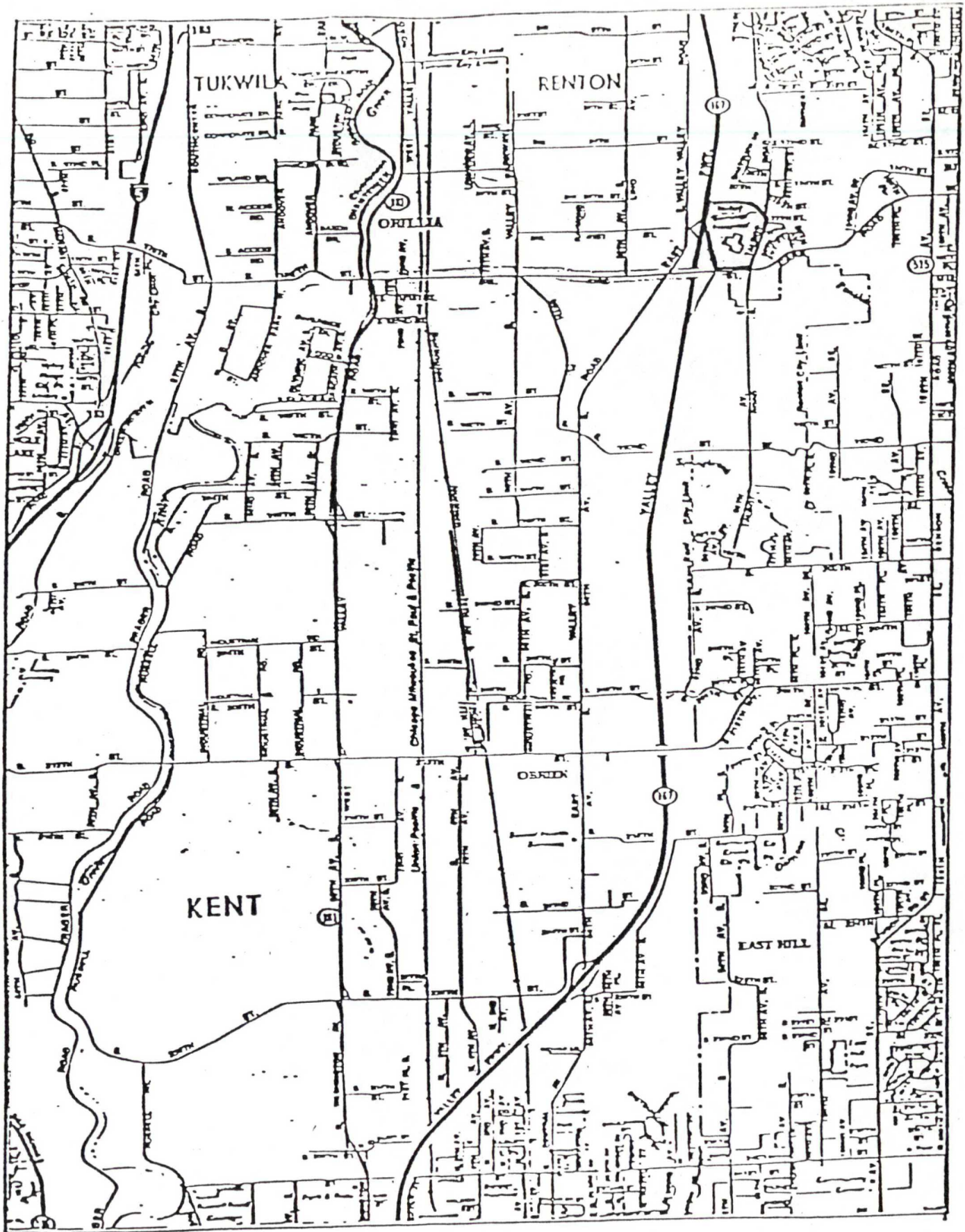


FIGURE 4
LOCATION MAP
VALLEY GENRAL HOSPITAL
RENTON, WASHINGTON

TO: All TAT/FIT Team Members
THRU: Regional Safety Officers
FROM: David L. Dahlstrom, Corporate Safety Director
SUBJECT: Emergency Incident Response Procedures
DATE: July 31, 1981
cc: Dr. R. Harbison, Dr. R. James, Dr. J. Nolan, Dr. E. Carr,
Dr. C. Zenz R. Gray, ~~L. Adams~~, G. Gallagher

So as to provide better and more comprehensive response service in the event of an emergency exposure in the field requiring immediate medical treatment, the procedure will be to initially contact Dr. Raymond Harbison via the emergency toxicological phone system. If for any reason Dr. Harbison does not respond within 15 minutes of activation, you are to contact your respective national program offices.

Since the TAT NPMO operates on a beeper system that is manned 24 hours a day, contact with a responsive individual will occur within minutes of activation. The FIT NPMO operates after hours on a call forwarding basis. Therefore, in the rare possibility that someone from this office cannot be reached, all FIT are to contact the TAT NPMO paging system. The respective numbers are:

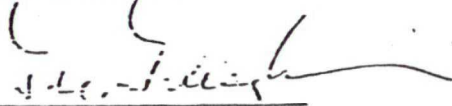
Emergency Toxicological Phone System	501/370-8263
TAT Emergency Paging System	716/882-2804
FIT Emergency Call-Forwarding System	<u>703/522-5065</u>

Please remember three things if an emergency incident occurs:

1. without hesitation get the injured person to the nearest treatment facility immediately;
2. contact Dr. Harbison or responsible emergency system, and,
3. contact your respective NPMO to notify them of the emergency.

Under no circumstances should activation of emergency notification systems preclude the immediate care of the injured individual.

Concurrence:


G. A. Gallagher

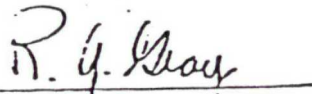

R. Gray



TABLE 1
ANALYSES OF SOIL SAMPLES COLLECTED AT
WESTERN PROCESSING COMPANY, INC.
SEPTEMBER 23, 1982^a

Station Number	Chemical	Detected Levels	IDLH level ^b (ppm)	TWAC (ppm)	SFEL ^c (ppm)
17	acetone	≤ 10 ppm	20,000	1,000	1,250
	MEK	"	3,000	200	300
	MIBK	"	NL	50	75
	2-pentanone	"	5,000	200	250
	2,4-dimethylcyclobutenone	"	NL	NL	NL
	ethylbenzene	"	2,000	100	125
	xylene	"	10,000	NL	NL
	toluene	≈ 50	2,000	(skin) 100	150
18A	trichloroethylene	≤ 1 ppm	1,000	(skin) 50	(150)
	1,2,3-trimethylcyclohexane	"	NL	NL	NL
	toluene	"	2,000	(skin) 100	150
	ethylbenzene	"	2,000	100	125
20	trichloro-tri-floroethane	ND	NL	NL	NL
	trichloroethylene	≤ 10 ppm	1,000	(skin) 50	(150)
	tetrachloroethylene	"	500	(skin) 50	(150)
	toluene	"	2,000	(skin) 100	150
	2-methyl 1-pentene	≈ 1 ppm	NL	NL	NL
	methyl cyclohexane	"	10,000	400	500
	ethyl cyclohexane	"	asphyxiant	NL	NL
3 + 11		ND			
22		ND			

NL - Not Listed ND - Not Detected

^aAnalyses performed by EEI corporate laboratory

^bNIOSH/OSHA Pocket Guide to Chemical Hazards, USDHHS, 1978

^cThreshold Limit Values for Chemical Substances in the Workroom Air, Adopted by the ACGIH for 1981.

LEVEL C

Equipment

1. Ultra-Twin respirator*
2. Robertshaw escape mask
3. Apron, butyl rubber, ankle length with sleeves
4. Gloves, butyl rubber
5. Gloves, surgical
6. Boot, neoprene, steel toe and shank
7. Booties, butyl rubber
8. Coveralls, chemical resistant
9. Underwear, cotton
10. Booties, disposable** (additional pair)
11. Gloves, disposable** (additional pair)
12. Hard hat with face shield**

When to Use

1. Open areas, no IDLH conditions
2. Well-documented history of site
3. Well-documented patterns of prior entry to site
4. Proximity to populated area
5. No evidence of chronic health effects
6. Continuous monitoring must take place

Used By

1. PDS Operators
2. Safety Officer
3. Work Parties

*Appropriate cartridge must be selected

**Optional

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: 10/8/82

SUBJECT: Supplement to Site Safety Plan for Well Installation and Soil/Groundwater Sampling, Western Processing Co., Inc., Kent, WA.

FROM: Ron Blair *Ron*
Safety and Health Officer

TO: Gary O'Neal, Director
Environmental Services Division

The EPA personnel authorized entry to the Western Processing site are listed below:

<u>Team Member</u>	<u>Responsibility</u>	<u>Date of Respirator Fit Testing</u>
- Fred Wolf	On-site Coordinator	April 28, 1982
- Ron Blair	Safety Advisor/Drill Operator	" " "
- Paul Boys	Sampler/Drill Operator	" " "
- Dave Tetta	Sampler/Drill Operator	" " "
- Andy Hess	Sampler/Drill Operator	June 9, 1982
- Lyn Frandsen	Sampler/Drill Operator	April 28, 1982
- Safa Shirazi	Sampler (Corvallis EPA)	Feb. 3, 1982

All of these personnel have had respiratory protection training and have been fit-tested using MSA ultra-twin respirators.

Drilling Procedures:

The portable minuteman drilling unit will be used by the EPA personnel to increase the depth of five wells on the site. This drill will only be operated by two EPA personnel with one employee operating the gear shift and controls while the other employee operates the hand wheel. A third employee should be on hand to provide drill extensions, tools and collect cutting samples.

The well casing to be installed by the contractor will extend approximately 6 inches above ground level. This will require the removal of the auger guide from the lower end of the unit and may create some problems during the installation and removal of each extension. Since the diameter of the portable drill bit is 3 inches and the diameter of the contractor's well hole will be 4 inches, a guide should not be necessary if the well hole is 3 to 6 feet deep.

Ear protection must be worn by all personnel within 25 feet of the portable drilling unit while it is in operation. Ear muffs or "EAR" ear plugs will be provided at the command post. The noise level around the drilling unit